

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Wednesday, May 20, 2020 2:26 PM
To: 'Joseph Hernandez'
Cc: Raley, Jim; Chris McKisson; Hamlet, Robert, EMNRD; Bratcher, Mike, EMNRD; Eads, Cristina, EMNRD; blm_nm_cfo_spill@blm.gov
Subject: RE: NVV2002439696 ROSS DRAW UNIT #042 @ 30-015-42945

NVV2002439696 ROSS DRAW UNIT #042 @ 30-015-42945

Mr. Hernandez,

The sidewalls need to be less than 600 mg/kg for chlorides, even though the depth to groundwater is over 100' and the release is on-pad. While vertical definition of contamination that may be acceptable is almost exclusively driven by depth to water, as determined, and as driven by Table I in rule, horizontal definition is different. The edges (horizontal definition) of a liquid release must be determined as well. The only value for determination of horizontal impact are derived by either "background" value as determined appropriate to Rule 29, or, for chloride, 600 mg/Kg in soils. This 600 mg/Kg value is discussed in detail in 19.15.29.13 D. (1).

Therefore, horizontal soils delineation for chloride should be 600 mg/KG (again, or background) for all liquid releases, either on or off production pad. It is conceivable that in determining the horizontal extent of chloride that the edge of the production pad may be encountered, if last sample taken on pad limit, sample(s) must be obtained off pad to determine extent of release. If horizontal delineation samples on pad eventually reach a mechanical barrier, (such as pipeline or battery) sample(s) should be obtained as near as possible on the linear opposite side of said barrier and as close as possible to the barrier.

It is conceivable that a liquid release may occur with, for example, a surface soil chloride of 19,000 mg/Kg, and if it is reliably determined that groundwater is over 101 feet below ground surface, then that value may stand as a vertical definition, but nonetheless, the horizontal value(s) for lateral extent of liquid release would still, of Rule 29 necessity, be 600 mg/Kg chloride or less. This would be inclusive of both "on-pad" or "off-pad" release area. The above is laboratory data driven, not just reported visual extent of a liquid release or calculated and reported release volumes. As indicated in the spill rule, a scaled map with horizontal and vertical definition of actual laboratory values is required. Generally, the top one foot sample suffices for immediate horizontal evaluation.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
811 S. First St., Artesia NM 88210
(575) 748-1283
Victoria.Venegas@state.nm.us

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to groundwater, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

From: Joseph Hernandez <jhernandez@ltenv.com>
Sent: Monday, May 18, 2020 10:03 AM

To: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Cc: Raley, Jim <James.Raley@wpenergy.com>; Chris McKisson <cmckisson@ltenv.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>; blm_nm_cfo_spill@blm.gov

Subject: [EXT] RE: NVV2002439696 ROSS DRAW UNIT #042 @ 30-015-42945

Importance: High

Victoria,

Can you please clarify whether you have requested additional delineation or remediation? Based on analytical data, delineation was achieved through confirmation sampling and all samples meet closure criteria. In shallow areas of the excavation on pad, floor samples near the edge of the extent were also representative of the sidewalls, which justifies horizontal delineation. If this evidence isn't enough, we can provide delineation data from 2/6/2020 – 2/14/2020 associated with the Ross Draw Unit 42 (2RP-3564); or if additional samples are required, can you clarify where they are required on the map? Are you requesting additional sample data outside of the known release extent on the well pad? If no further action is required in the pasture area, how is the approach to remediation on the well pad different, such that it would require additional samples?

Respectfully,



Joseph S. Hernandez

Project Geologist

432.894.5641 cell

3300 North A Street, Building 1 Unit 222

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From: Venegas, Victoria, EMNRD <Victoria.Venegas@state.nm.us>

Sent: Monday, May 11, 2020 4:19 PM

To: Raley, Jim <James.Raley@wpenergy.com>; Hamlet, Robert, EMNRD <Robert.Hamlet@state.nm.us>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Eads, Cristina, EMNRD <Cristina.Eads@state.nm.us>

Cc: CFO_Spill, BLM_NM <blm_nm_cfo_spill@blm.gov>; Ashley Ager <aager@ltenv.com>

Subject: NVV2002439696 ROSS DRAW UNIT #042 @ 30-015-42945

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Mr. Raley,

The OCD has denied the submitted Closure Plan C-141 for incident # NVV2002439696 ROSS DRAW UNIT #042 @ 30-015-42945 for the following reasons:

- Horizontal delineation/remediation will need to be completed. The edges -horizontal definition- of a liquid release must be determined. A visual footprint on the surface is not sufficient or adequate to assess the horizontal extent of the release. Lab data must be provided as evidence of delineation/remediation efforts. The values for determination of horizontal impact are derived by either "background" value as determined appropriate to Rule 29, or, for chloride, 600 mg/Kg in soils.
- No further action is necessary on the pasture area.

The Denied C-141 can be found in the online image file. Please review and make the required correction prior to resubmitting through the fee portal.

Thank you,

Victoria Venegas
State of New Mexico
Energy, Minerals, and Natural Resources
Oil Conservation Division
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